

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CIVIL NO. 98-1664 (ADC)
)	CIVIL NO. 98-2344 (ADC)
vs.)	Consolidated Cases
)	
33.92536 ACRES OF LAND, MORE)	
OR LESS, SITUATED IN VEGA BAJA,)	
COMMONWEALTH OF PUERTO RICO,)	
AND JUAN PIZA BLONDET, AND)	
UNKNOWN OWNERS)	
)	
Defendants.)	

JOINT MOTION FOR ENLARGEMENT OF TIME

Plaintiff United States of America ("Plaintiff" or the "Government") and Defendant Juan Piza-Blondet ("Defendant"), respectfully submit this Joint Motion for Enlargement of Time.

There being good cause for this motion, the parties state as follows:

1. At a telephonic status conference held before Judge Gustavo Gelpi on May 24, 2006, the United States informed the Court that it intends to file a dispositive motion in this eminent domain proceeding (Dkt. 128).
2. For this dispositive motion, the parties have jointly retained environmental consultant Gregory Morris to complete a wetlands jurisdictional determination report ("JD").
3. The Court ordered the JD to be completed by July 9, 2006, and for the United States to submit its dispositive motion within 15 days, or by July 24, 2006.
4. Despite the best efforts of both parties, the retained experts were unable to complete the JD report by the July 9, 2006 deadline.
5. The parties' experts are currently reviewing a draft of the JD report, and the parties believe that the report will be completed no later than July 28, 2006.

Accordingly, the parties propose the following extensions to the pretrial deadlines:

Completion of the JD Report	July 28, 2006
Deadline for All Dispositive Motions	August 14, 2006
Deadline for Responses to Dispositive Motions	August 29, 2006

Counsel for Defendant has reviewed this motion, and has authorized undersigned counsel to submit this as a joint motion.

Respectfully submitted this 19th day of July, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of July, 2006, a true and correct copy of the foregoing Plaintiff's First Request for Production was served via email and electronic filing addressed to:

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_____/s Jeffrey M. Tapick_____